

# United States District Court

for the

Southern District of Texas

UNITED STATES OF AMERICA )

V. )

Roderick DeWayne Chisley )

Monroe, Louisiana )

)

Case Number:

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 17, 2021 in the county of Webb in the  
(Date)

Southern

District of Texas, the defendant(s) violated:

### *Code Section*

Title 8 United States Code, Section  
1324

### *Offense Description*

**Knowing and in reckless disregard of the fact that a certain alien had come to, entered, and remained in the United States in violation of law, did transport and move, attempt to transport and move, and conspire to transport and move such alien within the United States, by means of transportation and otherwise, in furtherance of such violation of law.**

This criminal complaint is based on these facts:

See attachment "A".

☒ Continued on the attached sheet.

/s/ Alonzo Salinas III

Complainant's Signature

Submitted by reliable electronic  
means per Fed.R.Crim.P. 4.1, Alonzo Salinas  
sworn to and signature attested  
telephonically on December 20, 2021,  
at Laredo, Texas.

  
DIANA SONG QUIROGA  
UNITED STATES MAGISTRATE JUDGE

V.

**Roderick DeWayne Chisley****[CONT OF BASIS OF COMPLAINT]**

1. On December 17, 2021, Homeland Security Investigation (HSI) Special Agents (SA) received a request for investigative assistance from the United States Border Patrol North Station (C29) regarding a human smuggling event involving one (1) principal and fifty-two (52) undocumented individuals (UDIs). Border Patrol Agents (BPAs) stated the following:
2. On December 17, 2021, at approximately 9:20 p.m., a white in color Freightliner Cascadia tractor hauling a white Stoughton trailer approached the primary inspection lane. An immigration inspection was conducted on the driver, later identified as Roderick DeWayne CHISLEY. CHISLEY was asked if he was alone, to which he stated, "Yeah I'm alone". After an immigration inspection was conducted, CHISLEY was then released.
3. BPAs received an alert from the inspection booth on the license plate of the tractor CHISLEY was operating. BPAs attempted to stop CHISLEY, but CHISLEY had already exited the checkpoint. A BPA radioed BPAs at secondary inspection to stop CHISLEY and provided a description of the tractor-trailer he was operating. Shortly after, BPAs were able to locate and stop CHISLEY at the thirty (30) mile marker of Interstate Highway-35 on the northbound lane. BPAs conducted a license plate check on the tractor-trailer CHISLEY was operating. Records checks revealed that the tractor CHISLEY was operating had been reported stolen. BPAs then escorted CHISLEY to the Laredo North Border Patrol Station (C29).
4. During an inspection of the tractor, BPAs did not locate a manifest. BPAs also noticed an unusual seal on the rear trailer doors and noticed multiple seals where only one would be placed. BPAs requested a canine to assist with inspecting the trailer.
5. A BPA Canine arrived on scene and conducted a non-intrusive free air sniff on the tractor-trailer. The BPA canine alerted to the presence of concealed humans and /or narcotics. BPAs used bolt cutters to break the seal on the trailer doors and discovered fifty-two (52) individuals inside the trailer. An immigration inspection on all subjects was conducted which revealed all subjects to be in the United States illegally with no legal documents to be or remain in the United States. All fifty-two (52) undocumented individuals were later transported to the Laredo Border Patrol North Station for processing.
6. Homeland Security Investigations (HSI) Special Agents (SA) responded and initiated an investigation into the human smuggling event.
7. During a post-Miranda interview, CHISLEY stated an unknown male subject he had met sometime back in Laredo, Texas offered him a job to pick up a tractor- trailer from Laredo, and drop it off somewhere in San Antonio, Texas. CHISLEY stated he was not told what he would be hauling and stated he was going to get paid \$50,000 USD. CHISLEY stated the unknown male subject messaged him the address to where he was going to pick up the tractor-trailer. CHISLEY stated he picked up the tractor-trailer off the side of the road and was not met by anyone. CHISLEY stated the tractor was left running when he picked it up and was not provided with a manifest. CHISLEY later stated he picked up the tractor from one location and then picked up the trailer from a different location.
8. HSI SAs identified two (2) material witnesses: Jose Eduardo VILLATORO-Pelico and Hector ARRUE-Ocampo. Both foreign nationals of Guatemala admitted to illegally entering the United States by crossing the Rio Grande River to be smuggled to various cities within the United States for various amounts of money. Both subjects will be held as material witnesses in this case. Both material witnesses stated, when they arrived at the tractor-trailer location, they were instructed to load into the trailer. Both material witnesses stated there were people already inside when they

entered the trailer. Both material witnesses stated an unknown male subject closed the trailer doors. One (1) material witness stated the tractor-trailer went mobile approximately two (2) minutes after he was loaded inside the trailer. The second material witness stated approximately one to five (1-5) minutes after he was loaded inside, the tractor-trailer went mobile. Both material witnesses stated there were no stops until it arrived at the Laredo Border Patrol North Checkpoint. Both material witnesses stated they did not see the driver.

**[END]**

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